EXHIBIT R

LITE DEPALMA GREENBERG, LLC
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DOCUMENT ELECTRONICALLY FILED

IN RE SCHERING-PLOUGH CORPORATION	:	Civil Action No. 03-1204 (KSH)(MF)
	:	
ERISALITIGATION	:	
	:	

DECLARATION OF JOSEPH J. DEPALMA IN SUPPORT OF MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND CASE CONTRIBUTION AWARDS

I, Joseph J. DePalma, declare as follows:

1. I am a member in the law firm of Lite DePalma Greenberg, LLC. I submit this declaration in support of Plaintiff's request for an Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards based on my personal knowledge.

2. In connection with the prosecution of this matter, my firm, among other things, provided the following services:

- We participated in the drafting of the Complaint in this matter and accomplished service upon the defendants;
- We advised Lead Counsel as to strategy considerations;
- We prepared for and attended the Fed.R.Civ.P. 16 conference and various other status conferences with the Court;
- We acted as the liaison for communications between the Court and Lead Counsel;
- We participated in the drafting and filing of various pleadings including the following: *pro hac vice* applications for outside counsel, the parties' joint discovery plan, Plaintiff's motion to consolidate related cases, Plaintiff's amended complaints, Plaintiff's oppositions to several rounds of motions to dismiss filed by Defendants; papers in two rounds of Third Circuit appeals (Plaintiff's appeal of the Court's motion to dismiss ruling and Plaintiff's opposition to Defendants' appeal pursuant to FedR. Civ. P 23(f)); the

parties' protective order; Plaintiff's motion for class certification; numerous scheduling stipulations; Plaintiff's submissions of supplemental authorities for the Court's consideration; Plaintiff's response to the magistrate judge's report and recommendation; Plaintiff's opposition to defendants' motion to stay discovery, and; Plaintiff's motion for preliminary approval of the settlement;

- We attended and participated in the hearing on Defendants' motion to dismiss and in two Third Circuit oral arguments;
- We participated in the discovery process by drafting discovery requests, attending the parties' meet and confer conferences, reviewing documents produced by Defendants in a lengthy document review process and in supervising attorneys during this review;
- We attended and participated in multiple depositions;
- We assisted Lead Counsel with issues relating to the retention of experts;
- We attended several rounds of mediation, including mediation in Florida;
- We communicated with class members in response to their inquiries concerning the litigation;
- We participated in the settlement process by preparing settlement documents and attending the Court's preliminary approval hearing for the settlement.

3. During the period from the inception of this case through November 30, 2010, my firm performed 2,684.35 hours of work in connection with the litigation for which I seek payment. Based upon current hourly rates ordinarily charged to my firm's clients, the total lodestar value of this time is $956,140.00. Attached hereto as Exhibit A is a chart, which indicates the attorneys, paralegals and professional staff who worked on this litigation, their current hourly rates and their respective lodestar values.

4. The hourly rates utilized by my firm in computing its lodestar are at or below its usual and customary hourly rates charged for other similar matters. No upward adjustment in billing rates was made, notwithstanding the contingency and risk of the matters involved, the opposition encountered, the preclusion of other employment, the delay in payment, or other factors present in the case which would justify a higher rates of compensation.

5. The time and services provided by my firm for which fees are sought in the petition are reflected in contemporaneously maintained records of my firm. All of the services performed by my firm in connection with this litigation were reasonable and necessary in the prosecution of this case. No time is included in the fee petition for work in connection with the fee and expense application or accompanying documents, including this declaration.

6. My firm has expended or incurred costs and expenses totaling $13,758.03 in connection with the prosecution of this litigation. All of the expenses incurred by my firm for which reimbursement is sought were reasonable and necessary in the prosecution of this case. Attached hereto as Exhibit B is a chart which details the expenses incurred by my firm.

7. The expenses paid by my firm for which reimbursement is sought are reflected in the books and records of my firm. These books and records are prepared from checks, bills and expense vouchers, which are regularly kept and maintained by my firm and accurately reflect the expenses incurred.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 1st day of December, 2010

/s/ Joseph J. DePalma
JOSEPH J. DEPALMA

EXHIBIT A

LITE DEPALMA GREENBERG, LLC
LODESTAR REPORT

IN RE; SCHERING-PLOUGH CORPORATION
ERISA LITIGATION
INCEPTION – NOVEMBER 30, 2010

ATTORNEYS	HOURS	RATE	LODESTAR
ALLYN LITE (P)	5.50	700.00	$3850.00
JOSEPH J. DEPALMA (P)	464.0	700.00	$324,800.00
BRUCE D. GREENBERG (P)	1.30	700.00	$910.00
MICHAEL E. PATUNAS (P)	.80	625.00	$500.00
KATRINA CARROLL (P)	17.00	625.00	$10,625.00
MAYRA V. TARANTINO (A)	23.00	600.00	$13,800.00
ANN M. DOOLEY (A)	19.80	600.00	$11,880.00
JASON E. MACIAS (A)	4.0	500.00	$2,000.00
MARISOL PEREZ (A)	11.10	500.00	$5,550.00
MARY JEAN PIZZA (A)	2.20	400.00	$880.00
JENNIFER SARNELLI (A)	4.40	375.00	$1,650.00
SUSAN D. PONTORIERO (A)	451.9	375.00	$169,462.50
JULIE G. KRISHNASWAMI (A)	22.80	250.00	$5,700.00
DAVID WALLMAN (A)	208.85	250.00	$52,212.50
ISABELLA CASTELLANOS (A)	1098.00	250.00	$274,500.00
JAMES BRENNAN (A)	227.00	250.00	$56,750.00
JUSTIN ZEPPONE (A)	1.50	250.00	$375.00
PARALEGALS/LAW CLERKS	**HOURS**	**RATE**	**LODESTAR**
AMINA B. LEE (PL)	25.5	200.00	$5,100.00
NICOLE D'AMATO (PL)	14.8	200.00	$2,960.00
DANIELLE ALVAREZ (LC)	10.00	200.00	$2,000.00
LAURA LOPEZ (LC)	70.90	150.00	$10,635.00
TOTAL	**2,684.35**		**$956,140.00**

EXHIBIT B

LITE DEPALMA GREENBERG, LLC
EXPENSE REPORT

IN RE; SCHERING-PLOUGH CORPORATION
ERISA LITIGATION
INCEPTION – NOVEMBER 30, 2010

EXPENSE	AMOUNT
FILING FEES	$555.00
SERVICE OF PROCESS	$69.95
FEDERAL EXPRESS	$488.14
MESSENGER SERVICE	$335.75
PACER	$76.85
TRAVEL	$3,400.47
LODGING/MEALS	$2,685.73
ELETRONIC DISCOVERY	$800.00
TRANSCRIPTS	$377.47
PHOTOCOPYING	$4,255.50
FACSIMILE	$574.50
POSTAGE	$138.67
TOTAL	**$13,758.03**